## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE (WILMINGTON)

MARTIN MARCUS, Individually and on Behalf of All others Similarly Situated,

Plaintiff,

VS.

Case No. 1:05-cv-081 (GMS)

ASTRAZENECA PLC, TOM MCKILLOP, JONATHAN SYMONDS, HAKAN MOGREN. and PERCY BARNEVIK.

Defendants.

DECLARATION OF RALPH SIANNI IN SUPPORT OF THE MOTION OF THE LANG GROUP FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF ITS **SELECTION OF LEAD COUNSEL** 

X

### MILBERG WEISS BERSHAD & SCHULMAN LLP

Seth D. Rigrodsky (#3147) Ralph Sianni (#4151) 919 N. Market Street, Suite 411 Wilmington, Delaware 19801 (302) 984-0597 --and--

# MILBERG WEISS BERSHAD & SCHULMAN LLP

Steven G. Schulman Peter E. Seidman Sharon M. Lee One Pennsylvania Plaza - 49th Floor New York, NY 10119 (212) 594-5300

Proposed Lead Counsel

Attorneys for Plaintiff:

FARUQI & FARUQI, LLP

Nadeem Faruqi 320 East 39th Street New York, NY 10016 (212) 983-9330

Class members Anthony Lang, individually and on behalf of Hunglang Investment Group, and Charles R. Beyerlein (the "Lang Group" or "Movant"), upon the accompanying Declaration of Ralph Sianni, dated March 28, 2005, the accompanying memorandum of law in support, and upon all other papers and prior proceedings had herein, hereby move this Court for an Order:

- (A) appointing the Lang Group as Lead Plaintiff:
- (B) approving the Lang Group's choice of Milberg Weiss Bershad & Schulman LLP as Lead Counsel; and
  - (C) Granting such other and further relief as may be just, proper and equitable.

DATED: March 28, 2005

Respectfully submitted.

#### MILBERG WEISS BERSHAD & SCHULMAN LLP

By /s/ Ralph N. Sianni Seth D. Rigrodsky (#3147) Ralph Sianni (#4151) 919 N. Market Street, Suite 411 Wilmington, Delaware 19801 (302) 984-0597

--and--

## **MILBERG WEISS BERSHAD** & SCHULMAN LLP

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